

1 501 U.S. 89 (1991). Plaintiff should be entitled to reasonable attorney fees and expenses pursuant to
2 28 U.S.C. § 2412(d), upon proper request to this Court. Plaintiff should be entitled to costs as
3 enumerated in 28 U.S.C. § 1920, under 28 U.S.C. § 2412(a).

4 The parties further request that the Clerk of the Court be directed to enter a final judgment in
5 favor of Plaintiff and against Defendant, reversing the Commissioner's final decision.
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8 Dated: February 7, 2025

Respectfully submitted,

9 /s/ Marc Kalagian
10 MARC KALAGIAN
11 (*as authorized via email)
Attorney for Plaintiff

12 Dated: February 7, 2025

Respectfully submitted,

13 SUE FAHAMI
14 Acting United States Attorney

15 /s/ Jeffrey E. Staples
16 JEFFREY E. STAPLES
Special Assistant United States Attorney
Attorneys for Defendant

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18 IT IS SO ORDERED

19
20 HON. MAXIMILIANO D. COUVILLIER III
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: 2-11-25
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CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, MD 21235. I am not a party to the above-entitled action. On the date set forth below, I caused a copy of the above **STIPULATION TO VOLUNTARY REMAND PURSUANT TO SENTENCE FOUR OF 42 U.S.C. § 405(g) AND TO ENTRY OF JUDGMENT FOR PLAINTIFF** to be served upon the following by:

CM/ECF:

Marc Kalagian

Marc.Kalagian@rksslaw.com

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 7, 2025

/s/ Jeffrey E. Staples

JEFFREY E. STAPLES

Special Assistant United States Attorney